

EXHIBIT B

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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF VERONICA HAYES
GROMADA SUPPORTING MOTION FOR
SANCTIONS AGAINST BRET STANLEY**

Judge: Hon. Lisa J. Cisneros
Courtroom: G-15th Floor

1 I, Veronica Hayes Gromada, declare:

2 I am a partner at the law firm of Shook, Hardy & Bacon, L.L.P. I am a member in good
3 standing of the Bars of the State of Texas and of the District of Columbia and am admitted to
4 practice *pro hac vice* before this Court. I know the following facts to be true of my own knowledge,
5 except those matters stated to be based on information and belief. If called upon to testify, I could
6 and would testify competently to the truth of the matters stated herein. I respectfully submit this
7 declaration in support of Defendants' Motion for Sanctions Against Bret Stanley. I have also
8 reviewed the accompanying Declaration of Michael B. Shortnacy Supporting Defendants' Request
9 for an Award of Attorneys' Fees and Exhibit A thereto. The time and fees expended for (a)
10 investigating Mr. Stanley's Protective Order violations; (b) communicating with him repeatedly
11 and attempting to make him comply with the Protective Order without Court intervention; (c)
12 drafting and filing the Motion to Enforce Protective Order and related filings; and (d) seeking to
13 compel Mr. Stanley to perform the remedial measures required by this Court's August 18, 2025
14 Order were necessary and reasonable as set forth in the Motion and supporting documentation.

15 Cease and Desist and Investigative Work¹

16 2. On May 26, 2025, Defendants wrote to Mr. Stanley and the Plaintiffs' Steering
17 Committee ("PSC") demanding that Mr. Stanley cease violating the Protective Order. ECF 3512-
18 11. Defendants prepared a detailed, eight-page, single-spaced, letter describing the Protective
19 Order provisions violated, identifying Mr. Stanley's conduct violating the Protective Order, and
20 referencing the records that show his violative conduct in the MDL, and in *Smith v. Uber*
21 *Technologies, Inc., et al.*, and *Lord v. Uber Technologies, Inc., et al.*, pending in Texas and New
22 Jersey respectively. In drafting these letters, Defendants reviewed and compared pertinent non-
23 MDL discovery-related requests and MDL productions to identify and provide specificity about
24 the extent of the violations in the two cases. This involved working with a variety of in-house

25
26 ¹ My July 18, 2025 Declaration, which was attached to Defendants' prior Motion to Enforce
27 Protective Order, contains a detailed recitation of the facts surrounding the lead up to the Motion
28 to Enforce and the specific violations by Mr. Stanley. I expressly incorporate these facts by
reference here. ECF 3512, Ex. A, Gromada Dec.

1 counsel and outside counsel for non-MDL cases in Texas and New Jersey for an understanding of
2 the discovery and motion practice related to the MDL Protective Order violations.

3 3. Mr. Stanley responded on June 2, 2025, and denied any violation of the Protective
4 Order. ECF 3512-12. The PSC responded on June 4, 2025, and denied that Mr. Stanley's conduct
5 violated the Protective Order. ECF 3512-13.

6 Conferral Related Work

7 4. The parties conferred via videoconference in an attempt to resolve this dispute on
8 June 30, 2025 in compliance with L.R. 37-1. During that conferral, Mr. Stanley stated that the
9 names of Defendants' policies were not confidential. Mr. Stanley and the PSC representative in
10 attendance were asked (twice) whether it was their position that the content of one Confidential
11 MDL document (UBER_JCCP_MDL_000250806) was not confidential. They refused to answer,
12 stating they did not believe it would be productive to review specific documents. Mr. Stanley and
13 the PSC representative informed Defendants that they would continue using and disclosing the
14 Confidential Information unless this Court ordered them to stop.

15 5. While Defendants vehemently disagreed with Mr. Stanley and the PSC's position,
16 in the spirit of compromise and to conserve judicial resources by resolving issues among the
17 parties, Defendants proposed an "agreement to disagree" on July 8, 2025 whereby: (a) Mr. Stanley
18 and the PSC "confirm that the only cases in which the names of Uber policies identified in the
19 MDL have been used are the *Smith* and *Lord* cases identified in our letter;" and (b) "agree that
20 before using the names of Uber policies or other information from confidential documents
21 identified in the MDL in any other case, you will seek either Uber's permission or permission from
22 the MDL Court." ECF 3512-15.

23 6. Mr. Stanley and the PSC rejected this compromise proposal on July 11, 2025. ECF
24 3512-16. Mr. Stanley explained that it was "not workable" for him to seek permission from either
25 Uber or the MDL Court before using Uber's Confidential Information to make discovery requests
26 in his non-MDL matters. *Id.* Instead of agreeing to Defendants' compromise proposal, Mr. Stanley
27 wrote that the dispute "need[ed] to be brought in front of the Court. . ." " and the parties "need[ed]

1 to discuss a filing and response schedule.” ECF 3512-16.

2 7. Shortly thereafter, Defendants’ MDL counsel learned that Mr. Stanley’s co-counsel
3 in *Lord v. Uber Technologies* had publicly filed the Confidential Information as part of a motion
4 to compel. At the same time, Defendants learned that Mr. Stanley’s spreadsheet² was being further
5 disseminated among Plaintiff’s counsel in non-MDL cases. (ECF 3512, Ex. A, Gromada Dec., Ex.
6 3 (Stanley Email) and Ex. 4 (December 19, 2024 transcript) at 32:6-12; 36:12-16).

7 Motion Drafting, Hearing and Related Activities

8 8. As a result of Mr. Stanley’s breaches, Defendants were forced to file their Motion
9 to Enforce Protective Order and related Motions to Seal and Shorten Time, followed by a request
10 for an expedited hearing. (ECF 3512, 3511, and 3513). The Motion required Defendants to expend
11 significant time and resources conducting factual and legal research, investigating Mr. Stanley’s
12 discovery violations outside the MDL, and extensive briefing with copious supporting
13 documentation. For example, Defendants reviewed and distinguished each of the cases Mr.
14 Stanley and the Plaintiffs’ Steering Committee cited in their responses to Defendants’ cease and
15 desist letters, as well as addressed the arguments set forth in Mr. Stanley’s response to the Motion.
16 Beyond identifying and understanding the nature of Mr. Stanley’s protective order violations,
17 Defendants needed to establish the extent to which Mr. Stanley had used and/or disclosed protected
18 information across *four* matters in Texas and New Jersey: *Smith v. Uber Technologies, Inc., et al.*,
19 *Lord v. Uber Technologies, Inc., et al.*, *Casey Jones v. Uber Technologies, Inc. et al.*, and *Soto v.*
20 *Uber Technologies, Inc. et al.*³ See ECF 3512-1, par. 18, 40, 42; ECF 3512-17; ECF 3512-18.
21 Defendants invested significant time and resources, with contributions by in-house counsel, MDL
22 counsel, and outside counsel across the non-MDL matters to make a strong showing to the Court
23 that was packaged in a helpful and clear manner. Indeed, the Court found the detailed declaration
24

25 ² As further detailed in my prior Declaration, Mr. Stanley’s spreadsheet contained a detailed list of
26 Defendants’ confidential and proprietary policy-related resources, Knowledge Bases, and their
locations within the company’s virtual filing cabinet. ECF 3512, Ex. A, Gromada Dec.

27 ³ For further background as to how the Defendants learned about the Protective Order violations
in the *Casey Jones v. Uber Technologies, Inc. et al.*, and *Soto v. Uber Technologies, Inc. et al.*
cases, see ECF 3512, Ex. A, Gromada Dec., ¶ 39-42.

1 helpful and clear. *See* Motion to Enforce Protective Order Hearing Transcript, p. 9, lines 9 - 16.

2 9. Defendants gave the same level of attention and detail to preparing the proposed
3 Order and Reply Brief. ECF 3512-19 and 3598. Defendants spent significant time briefing their
4 arguments while striking a balance between making a strong showing, while protecting their
5 confidential information. An essential part of this process was identifying the right exhibits from
6 MDL and non-MDL discovery, motions, transcripts and conferral communications, and parsing
7 through redactions for the Motion to Seal. Moreover, Defendants kept the proposed Order and
8 Reply Brief focused on the critical issue before the Court, the fact that a violation occurred: a fact
9 supported by caselaw and Defendants' carefully curated exhibits. In doing so, the Court was able
10 to rule from the bench, while reserving one issue on the proposed order form, which required
11 further detailed review and identification of each line item from Mr. Stanley's spreadsheet that
12 violated the MDL protective order, not only for the Court, but for Mr. Stanley as well. *See* Exhibit
13 A to Motion for Sanctions at 14:20-16:10 (August 12, 2025 Transcript).

14 Enforcement of the August 18, 2025 Order

15 10. On August 12, 2025, this Court found that Mr. Stanley violated the Protective
16 Order. ECF 3692. On August 18, 2025, the Court entered a proposed order jointly prepared and
17 submitted by the parties requiring Mr. Stanley to take modest steps to mitigate the damages caused
18 by his violation ("August 18, 2025 Order"). ECF 3708. The August 18, 2025 Order, which Mr.
19 Stanley and the PSC jointly prepared with Defendants and submitted to the Court, required Mr.
20 Stanley to take the following remedial measures:

21 (c) Within three days of the date of this Order, Mr. Stanley shall
22 identify to Defendants' counsel all persons outside of the MDL
23 Litigation to whom Mr. Stanley has disclosed any information
24 covered by the Protective Order, including without limitation, the
25 Confidential Information, **and** Mr. Stanley shall identify to
26 Defendants' counsel **all court proceedings in which Mr. Stanley**
27 **is aware that the Confidential Information has been used or**
28 **disclosed** in discovery or otherwise;

(d) Within three days of the date of this Order, Mr. Stanley shall
provide a copy of this Order to all persons **and courts** identified
pursuant to paragraph (c) of this Order with notice to Defendants'

1 Counsel of same; and

2 (e) Mr. Stanley shall take reasonable efforts to retrieve or ensure the
3 destruction of all unauthorized Confidential Information to all
4 persons identified pursuant to paragraph (c) of this Order.

5 ECF 3708 (emphases added).

6 Mr. Stanley Violated the August 18, 2025 Order

7 11. Mr. Stanley is one of the Plaintiffs' counsel in *Lord v. Uber Technologies, Inc., et*
8 *al.* While Mr. Stanley identified counsel in the *Lord* case to whom he disclosed the Confidential
9 Information as required by the August 18, 2025 Order, Mr. Stanley failed to provide a copy of
10 the August 18, 2025 Order to the *Lord* court by August 21, 2025 as required by the Order. After
11 the deadline passed, Defendants' counsel emailed Mr. Stanley and identified several apparent
12 violations of the August 18, 2025 Order, including his failure to provide a copy of the August 18,
13 2025 Order to the *Lord* court by August 21, 2025 as required. A true and correct copy of this
14 August 22, 2025 email is attached as Exhibit 1 to this Declaration. Mr. Stanley's response failed
15 to address the *Lord* case. A true and correct copy of Mr. Stanley's response is attached as Exhibit
16 2 to this Declaration.

17 12. Because of Mr. Stanley's failure to provide a copy of the August 18, 2025 Order to
18 the *Lord* court by August 21, 2025 as required, Defendants submitted the August 18, 2025 Order
19 to the *Lord* court on August 26, 2025. Thereafter, Mr. Stanley wrote to Defendants' counsel and
20 the *Lord* court stating that the email he intended to send transmitting the August 18, 2025 Order
21 to the *Lord* court was "hung in my outbox." In a subsequent email on August 27, 2025, Mr. Stanley
22 said he "thought [Defendants' counsel] were working from stale information" when they noted his
23 failure to comply with the August 18, 2025 order in *Lord*.

24 13. Mr. Stanley also failed to provide a copy of the August 18, 2025 Order to the court
25 in *Casey Jones v. Uber Technologies, Inc. et al.* even though Mr. Stanley disclosed the Confidential
26
27
28

1 Information to *Jones* Plaintiff's counsel, Evan Lide,⁴ in that case. After the August 21, 2025
2 deadline, Defendants' counsel emailed Mr. Stanley three times asking for confirmation that he
3 provided the August 18, 2025 Order to the *Jones* court as required. Mr. Stanley did not respond to
4 the first two emails and responded to the third email but failed to address the *Jones* case. Exhibit
5 2. Ultimately, the *Jones* court received the August 18, 2025 Order not from Mr. Stanley, as ordered,
6 but from Plaintiffs' co-counsel in the *Jones* case, Mr. Lide on August 25, 2025. Evan Lide is a
7 colleague of Mr. Stanley's co-counsel in *Lord*.

8 14. The discovery request in *Soto v. Uber Technologies, Inc. et al.* containing the
9 Confidential Information was attached to Defendants' Declaration Supporting Motion to Enforce
10 Protective Order. ECF 3512-18. Therefore, Mr. Stanley was given notice that Confidential
11 Information was disclosed in *Soto* as set forth in Defendants' Motion. The discovery requests
12 attached to Defendants' Motion to Enforce Protective Order identified the Plaintiff's counsel who
13 disclosed the Confidential Information in *Soto* and identified the court and case number. ECF
14 3512-18.

15 15. Mr. Stanley maintained that the August 18, 2025 Order did not require him to take
16 any action in *Soto* because he did not disclose the Confidential Information to the *Soto* Plaintiff's
17 counsel. Specifically, Mr. Stanley wrote to Defendants' counsel on August 20, 2025 stating: "I
18 don't have any connection to any counsel in the *Soto* matter and did not disclose anything to that
19 firm." Because Mr. Stanley was given notice that the Confidential Information was being used in
20 *Soto*, he was plainly required to provide the August 18, 2025 Order to the *Soto* Court whether Mr.
21 Stanley disclosed the Confidential Information to the *Soto* Plaintiff's counsel or not.

22 16. Therefore, after the August 21, 2025 deadline, Defendants' counsel emailed Mr.
23 Stanley asking for confirmation that he provided a copy of the August 18, 2025 Order to the *Soto*
24 court as required. Mr. Stanley's response stated: "I do not know the lawyers in the *Soto* matter and
25 did not disclose the documents to any lawyers in *Soto*. I know nothing about that case or who [*sic*]
26

27 ⁴ Evan Lide is an attorney with Stark & Stark, PC, along with Bruce Stern, Mr. Stanley's co-
28 counsel in *Lord*.

1 the firms involved. I have instructed all attorneys to delete what they have seen that is in violation
2 according to Cisneros and provided the Order to the Courts subject to my disclosure.”

3 17. Defendants’ counsel noted that the *Soto* Plaintiff’s counsel was identified in the
4 Motion to Enforce Protective Order filing and stated, “our position is to the extent you are aware
5 that the Confidential Information from the MDL is being used in that matter, notice to counsel and
6 the court is required.” Mr. Stanley did not respond; therefore Defendants’ counsel again emailed
7 him stating he was in violation of the August 18, 2025 Order. Exhibit 1.

8 18. Mr. Stanley’s response states, “I didn’t disclose anything to the *Soto* counsel. I
9 informed you I had no knowledge of which court the case was in or who counsel was. Stop playing
10 games. If you have information, then share it. If you would prefer to go to the Court, I’ll be there.”
11 Exhibit 2. Because of Mr. Stanley’s failure to provide a copy of the August 18, 2025 Order to the
12 *Soto* court as required, Defendants submitted the order on August 26, 2025.

13 19. At the same time that Mr. Stanley was failing to take several actions required by
14 the August 18, 2025 Order, Mr. Stanley continued to aggressively pursue discovery in his non-
15 MDL cases against Defendants during this time period. Specifically, between August 18, 2025 and
16 August 26, 2025, Mr. Stanley sent at least ten emails to Defendants’ MDL counsel and Defendants’
17 counsel in *Smith v. Uber Technologies* related to his continued efforts to obtain discovery in the
18 *Smith* case.

19 On October 8, 2025, Mr. Stanley’s Lord Co-Counsel
20 Again Publicly Filed the Confidential Information⁵

21 20. On October 8, 2025, Mr. Stanley’s co-counsel in *Lord v. Uber Technologies* once
22 again publicly filed Defendants’ Confidential Information in violation of the Protective Order.
23 Specifically, Mr. Stanley’s co-counsel publicly filed the exact same discovery request—which this
24 Court had found violated the Protective Order— that was attached to Defendants’ Declaration
25 Supporting Motion to Enforce Protective Order. ECF 3512-7; 3708.

26 _____
27 ⁵ Defendants have not included in this Motion recovery of fees for time spent addressing the
28 October 8 violation but reserve their right to bring a separate motion seeking appropriate relief at
a later time.

EXHIBIT 1

From: [Gromada, Veronica G. \(SHB\)](#)
To: [Steven Cohn](#); [Bret Stanley](#); [Chris Cox](#)
Cc: [Roopal Luhana](#); [Rachel Abrams](#); [Sarah London](#); [Andrew Kaufman](#); [An Truong](#); [Priest Johnson, Kimberly \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#)
Subject: In re Uber, Proposed Joint Order re Protective Order
Date: Friday, August 22, 2025 5:54:00 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Bret,

As you know, the Court entered an Order on August 18, 2025 regarding the Protective Order violations. You and the PSC agreed to that Order.

Among other things, the August 18, 2025 Order requires that within three days (August 21, 2025), you:

...identify to Defendants' counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information covered by the Protective Order, including without limitation, the Confidential Information, **and** Mr. Stanley shall identify to Defendants' counsel **all court proceedings in which Mr. Stanley is aware that the Confidential Information has been used or disclosed in discovery or otherwise;**

(d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this Order to all persons **and courts** identified pursuant to paragraph (c) of this Order with notice to Defendants' Counsel of same...

Thus, you were not simply required to identify persons to whom you disclosed confidential information, but also to identify "all court proceedings in which [you are] **aware**" that confidential information has been disclosed and provide a copy of the August 18, 2025 Order to those courts.

You have failed to comply with the August 18, 2025 Order as follows:

1. **Lord**: You have not provided a copy of the August 18, 2025 Order to the court.
2. **Casey Jones**: Even though you are aware that confidential information is being used in this case, you have not provided a copy of the August 18, 2025 Order to the court.

3. Soto: Even though you are aware that confidential information is being used in this case and has been disclosed to the plaintiff's counsel, you have not provided notice and a copy of the August 18, 2025 Order to the plaintiff's counsel or to the court.

In addition to the August 18, 2025 Order, the MDL Protective Order separately requires certain actions in the event confidential information is disclosed. [ECF, par. 10]

We intend to raise your non-compliance with the August 18, 2025 Order with the MDL Court if the above violations are not remedied by 3:00pm PST on Monday, August 25, 2025.

Veronica G. Gromada

Partner

Shook, Hardy & Bacon L.L.P.

713-546-5683 | vgromada@shb.com



From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, August 15, 2025 3:52 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Steve and Bret,

Defendants accept the proposed edits. We will present the revised version to the court as an agreed proposed order.

Thank you.

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Friday, August 15, 2025 2:12 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: Re: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Veronica,

Our proposed edits are attached in redline.

Thanks,
Steve

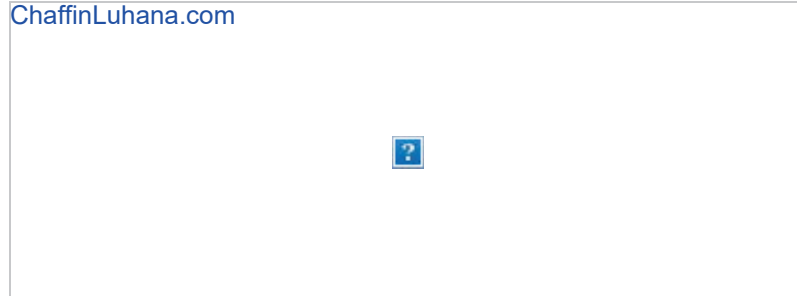
Steven Cohn | Partner

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Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

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From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Friday, August 15, 2025 1:43 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: Re: In re Uber, Proposed Joint Order re Protective Order

Veronica,

We should have our proposed edits to you shortly.

Thank you,
Steve

Steven Cohn | Partner

E: cohn@chaffinluhana.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, August 15, 2025 11:48 AM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Good morning, Steve and Bret.

We're following up regarding the proposed joint order sent yesterday. Do you have any comments regarding the proposed order? We would like to prepare the submission before the end of the workday.

Please let us know your thoughts.

Thank you.

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Thursday, August 14, 2025 1:28 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Steve,

Please see the attached proposed order for your review.

Thanks

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Thursday, August 14, 2025 11:24 AM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: Re: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Thank you.

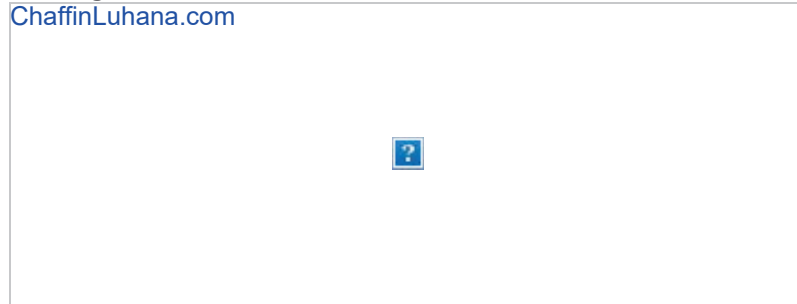
Steven Cohn | Partner

E: cohn@chaffinluhana.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Thursday, August 14, 2025 12:22 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>;

Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>;

Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest

Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: In re Uber, Proposed Joint Order re Protective Order

Hi, Steve.

We're working on a draft Order and will have it to you in about an hour.

Thanks.

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Thursday, August 14, 2025 9:01 AM

To: Chris Cox <christopher.cox@kirkland.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>;

Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>;

Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>

Subject: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Veronica/Chris,

Per the Court's Order (ECF 3692), please let us know if you are available to meet and confer this afternoon regarding the Proposed Order related to the Protective Order. Alternatively, if you can send us a draft proposed order, we can review and let you know if we agree or have any proposed edits (and then meet and confer if there are any issues that remain).

Thanks,
Steve

Steven Cohn | Partner

E: cohn@chaffinluhana.com

P: [\(347\) 269-4465](tel:(347)269-4465)

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Mailing Address:

Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

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EXHIBIT 2

From: Bret Stanley
To: Gromada, Veronica G. (SHB); Steven Cohn; Chris Cox
Cc: Roopal Luhana; Rachel Abrams; Sarah London; Andrew Kaufman; An Truong; Priest Johnson, Kimberly (SHB); Shortnacy, Michael (SHB)
Subject: Re: In re Uber, Proposed Joint Order re Protective Order
Date: Friday, August 22, 2025 7:19:36 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

EXTERNAL

Veronica-

I didn't disclose anything to the Soto counsel. I informed you I had no knowledge of which court the case was in or who counsel was.

Stop playing games. If you have information, then share it.

If you would prefer to go to the Court, I'll be there.

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Review



Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, August 22, 2025 5:54:08 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Chris Cox <christopher.cox@kirkland.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

Bret,

As you know, the Court entered an Order on August 18, 2025 regarding the Protective Order violations. You and the PSC agreed to that Order.

Among other things, the August 18, 2025 Order requires that within three days (August 21, 2025), you:

...identify to Defendants' counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information covered by the Protective Order, including without limitation, the Confidential Information, **and** Mr. Stanley shall identify to Defendants' counsel **all court proceedings in which Mr. Stanley is aware that the Confidential Information has been used or disclosed in discovery or otherwise;**

(d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this Order to

all persons **and courts** identified pursuant to paragraph (c) of this Order with notice to Defendants' Counsel of same...

Thus, you were not simply required to identify persons to whom you disclosed confidential information, but also to identify "all court proceedings in which [you are] **aware**" that confidential information has been disclosed and provide a copy of the August 18, 2025 Order to those courts.

You have failed to comply with the August 18, 2025 Order as follows:

1. Lord: You have not provided a copy of the August 18, 2025 Order to the court.
2. Casey Jones: Even though you are aware that confidential information is being used in this case, you have not provided a copy of the August 18, 2025 Order to the court.
3. Soto: Even though you are aware that confidential information is being used in this case and has been disclosed to the plaintiff's counsel, you have not provided notice and a copy of the August 18, 2025 Order to the plaintiff's counsel or to the court.

In addition to the August 18, 2025 Order, the MDL Protective Order separately requires certain actions in the event confidential information is disclosed. [ECF, par. 10]

We intend to raise your non-compliance with the August 18, 2025 Order with the MDL Court if the above violations are not remedied by 3:00pm PST on Monday, August 25, 2025.

Veronica G. Gromada

Partner

Shook, Hardy & Bacon L.L.P.

713-546-5683 | vgromada@shb.com



From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, August 15, 2025 3:52 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Steve and Bret,

Defendants accept the proposed edits. We will present the revised version to the court as an agreed proposed order.

Thank you.

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Friday, August 15, 2025 2:12 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley

<bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: Re: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Veronica,

Our proposed edits are attached in redline.

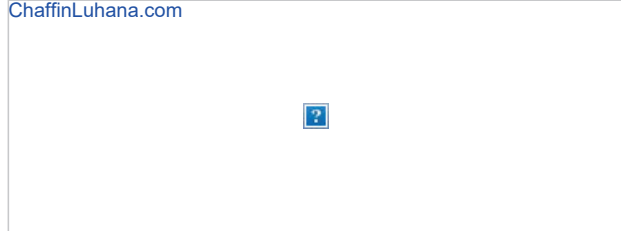
Thanks,
Steve

Steven Cohn | Partner

E: cohn@chaffinluhana.com

P: (347) 269-4465

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From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Friday, August 15, 2025 1:43 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: Re: In re Uber, Proposed Joint Order re Protective Order

Veronica,

We should have our proposed edits to you shortly.

Thank you,
Steve

Steven Cohn | Partner

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P: (347) 269-4465

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, August 15, 2025 11:48 AM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Good morning, Steve and Bret.

We're following up regarding the proposed joint order sent yesterday. Do you have any comments regarding the proposed order? We would like to prepare the submission before the end of the workday.

Please let us know your thoughts.

Thank you.

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Thursday, August 14, 2025 1:28 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Steve,

Please see the attached proposed order for your review.

Thanks

From: Steven Cohn <cohn@chaffinluhana.com>
Sent: Thursday, August 14, 2025 11:24 AM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabels@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: Re: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Thank you.

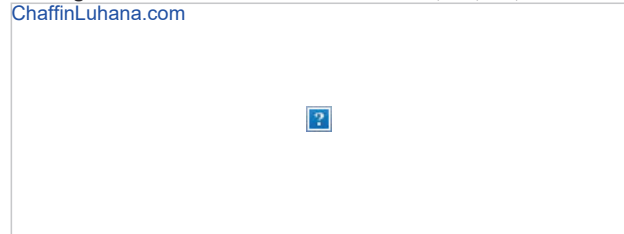
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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Thursday, August 14, 2025 12:22 PM
To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabels@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: In re Uber, Proposed Joint Order re Protective Order

Hi, Steve.

We're working on a draft Order and will have it to you in about an hour.

Thanks.

From: Steven Cohn <cohn@chaffinluhana.com>
Sent: Thursday, August 14, 2025 9:01 AM
To: Chris Cox <christopher.cox@kirkland.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>
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